

Congressman Raúl Grijalva, U.S. House of Representatives
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RAÚL M. GRIJALVA 7TH DISTRICT, ARIZONA COMMITTEES: EDUCATION AND THE WORKFORCE RESOURCES	Congress of the United States House of Representatives Washington, DC 20515-0307	1440 LONGWORTH HOUSE OFFICE BUILDING WASHINGTON, D.C. 20515-0307 (202) 225-2435 810 EAST 32ND STREET, SUITE 102 TUCSON, ARIZONA 85719 (520) 622-6788 1455 SOUTH 4TH AVENUE, SUITE 4 YUMA, ARIZONA 85504 (908) 343-1933 WWW.HOUSE.GOV/GRIJALVA
November 4, 2003		
Dr. Jerry Pell Office of Fossil Energy U.S. Department of Energy Washington D.C. 20585 Jerry.Pell@hq.doe.gov FAX: 202-318-7761		
RE: Tucson Electric Power Sahuarita-Nogales Transmission Line Draft Environmental Impact Statement		
Dear Dr. Pell:		
1	<p>I am writing to you to voice my strong opposition to the construction of a high power transmission line through Santa Cruz County and into Sonora, Mexico.</p> <p>The proposed transmission line would cut through the heart of one of Southern Arizona's crown jewels. The beautiful Tumacácori, Atascosa, and Pajarito Mountains (the "Tumacácori Highlands") and the Santa Cruz Valley are rich in culture, history, and ecology. The valley is a place of unparalleled historical significance while the mountains provide sanctuary for wildlife and birds and well as human beings, who visit them as a temporary respite from the busy modern world.</p> <p>The Tumacácori Highlands provide numerous opportunities to the people of southern Arizona and visitors from afar. Wildlife and bird watching, hiking, hunting, picnicking, photography, visiting ghost towns, and scenic driving are all activities enjoyed in the region. The mountains are still relatively pristine, which increases their value for all of the above activities, and makes the wildlife habitat outstanding.</p> <p>This region is home to many endangered, threatened and sensitive species. On two separate occasions in the last two years, trip cameras have taken photographs of jaguars in Santa Cruz County. There is now no doubt that this fascinating and imperiled species exists in the region and in these mountains. The jaguar is not the only endangered species to call this area home. The mountain complex also provides habitat for many other wildlife and plant species.</p>	

Comment No. 1

The Federal agencies recognize that many people value certain areas along the alternative transmission corridors as wild places and have a holistic concern for the natural beauty, undisturbed landscape features, and abundant plant and animal wildlife that characterize those areas. These unique natural characteristics give such wild areas their "sense of place," which includes people's visual and aural perceptions of the area's undisturbed sky, natural landscape, water resources, and plant and animal populations. The sense of place also includes the spiritual value that many people associate with these wild areas because of their cultural and religious significance. The Federal agencies recognize and appreciate this holistic sense of place and have revised the introductory sections of Chapters 3 and 4 of the Final EIS to acknowledge these values.

The agencies recognize that the natural and cultural characteristics that contribute to a sense of place cannot be measured in the same manner as some other resources in an environmental analysis. However, in order to analyze potential impacts effectively and document the analysis, it is necessary to consider the resource areas individually. Thus, the EIS discussions of affected environment in Chapter 3 and potential impacts in Chapter 4 are divided into distinct resource areas (e.g., visual resources, biological resources, cultural resources).

The Federal agencies have evaluated in the EIS the potential impacts from the proposed project on the cultural, historical, biological, visual, and recreational resources cited by the commentor. Chapter 3 describes the affected environment of the Tumacacori Highlands and Santa Cruz Valley in the vicinity of the proposed project for each resource area. Chapter 4 evaluates the potential impacts from the proposed project on each resource area (refer to Sections 3.4 and 4.4, Cultural Resources; Sections 3.3 and 4.3, Biological Resources; Sections 3.2 and 4.2, Visual Resources; and Sections 3.1.2 and 4.1.2, Recreation).

The potential impacts to biological resources, including impacts to special status species and wildlife habitat, are addressed in Section 4.3. Section 3.3.3 acknowledges the potential for jaguar in all three of the proposed corridors. Section 4.3.3 provides analysis supporting the "May affect, not likely to adversely effect" determination for the potential impact on jaguar from the

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1	<p>There are currently numerous efforts all over the Santa Cruz Valley and its vicinity to protect and restore the many resources of this region. For example, the Fish and Wildlife Service is restoring native wildlife at the Buenos Aires National Wildlife Refuge, and other sites nearby. The National Park Service is restoring mission buildings, other cultural sites, and land along the Santa Cruz River at the Tumacacori National Historical Park. There is an ongoing effort to designate a National Heritage Area that would encompass the Santa Cruz Valley and would recognize and promote the entire area, and all of its outstanding and remarkable sites.</p>
1 cont.	<p>I strongly support the above efforts, as I believe the region possesses a unique combination of history and natural environment, deserving of recognition and protection. Because of my belief that the region is so special, I have also targeted the Tumacacori Highlands for wilderness designation. As noted above, the mountains, canyons and valleys of this area contain many important and rare attributes that warrant protection under the Wilderness Act of 1964. Conservation organizations and individuals have long been engaging in efforts to protect this area, and I believe it is high time for Congress to act.</p>
	<p>In short, there is a concerted effort to conserve many different places in the general region where the transmission line route would travel. However, the construction of this transmission line would undermine all of the work that numerous individuals, agencies, and organizations have done to see this part of the country preserved.</p>
2	<p>I have numerous concerns about the project as planned. First, I'm concerned that the route will cause incredible environmental damage if it is built where planned, through the heart of the Tumacacori Mountains and parts of the Santa Cruz Valley. Secondly, I question whether this project is really in the best interests of the public, and specifically the residents of Nogales, whom it is intended to serve. No matter which route the 345 kV line were to travel, I do not believe that such a high-powered line is necessary to meet the needs of the residents of Santa Cruz County. Your agency seems to have ignored viable solutions to the power supply problem in southern Arizona, and has instead allowed Tucson Electric Power company's bottomline to drive the decisionmaking process in this instance. Using the pretext of providing power to the citizens of Santa Cruz County to blaze an extremely unsightly and environmentally detrimental route through roadless and backcountry areas is unconscionable.</p>
3	<p>The proposed western route is the longest, most expensive, and most environmentally damaging of all alternatives considered. The crossover route is arguably worse, but in any case, no better. The western and crossover routes would slice through some of southern Arizona's most beautiful vistas, impact numerous cultural sites, and destroy the outstanding natural scenery of the area. The central route would also greatly impact residents, culturally important locales, and viewsheds along the I-19 corridor. These routes are not compatible with any of the conservation and restoration efforts I mentioned above, nor are they in the best interests of citizens or the environment of Santa Cruz County and Nogales.</p>

Comment No. 1 (continued)

proposed project.

The Arivaca Cienega Trail in the Buenos Aires National Wildlife Refuge starts about 0.25 mi (0.4 km) east of Arivaca. It is approximately 10 mi (16 km) west of the Western and Crossover Corridors, and approximately 15 mi (24 km) west of the Central Corridor. It would not be affected by the proposed project.

The construction of transmission line structures and associated access roads has the potential to adversely affect archaeological and historical sites, both through direct effects from land disturbance and through visual impacts based on the area of land disturbed (see Section 4.2). The historic parks in Tumacacori and Tubac are outside of the three 0.25-mi (0.40-km) wide study corridors. Therefore, the impact on these historic parks from the Central Corridor (the closest of the corridors to these parks) would be limited to visual impacts. Since publication of the Draft EIS, a field review of these sites was conducted and a report, the "Proposed TEP Powerline—Visibility from Tumacacori and Tubac Historic Sites", was added to Appendix I. Based on that field review and associated report, Section 4.4.1.2 has been revised with the following language: "Impacts to views from the historic parks in Tumacacori and Tubac would be minimal. Currently, views from both sites are blocked largely by vegetation, structures, I-19, and topography. It is unlikely that the proposed powerline would be seen from either site (See Appendix I for more information). The ongoing effort to designate the Santa Cruz Valley as a National Heritage Area is expected to be completed in 2005. The significance of this designation is to gain recognition of the area as having a diverse natural and cultural heritage. This designation would not create any new Federal, state, or local regulatory oversight over the area, and the designation is not expected to affect or be affected by the proposed project.

The Federal agencies are aware of Congressman Grijalva's stated intent to initiate legislation that would establish an addition to the National Wilderness Preservation System in the Tumacacori Highlands portion of the Coronado National Forest. The proposal would double the existing Pajarita Wilderness south of Ruby Road from 7,529 acres (3,047 ha) to 15,931 (6,447 ha) acres and create an entirely new wilderness area of 76,171 acres (30, 825 ha) north of that road. Section 5.2.4 now includes a discussion of this potential proposal.

Comment No. 2

In permit proceedings such as TEP's, where an applicant seeks permission for a specific proposed project to meet the applicant's specific purpose and need, the Federal agencies generally limit their review to alternatives similar to the one proposed, i.e., that is, alternatives that would meet the applicant's purpose and need. The agencies generally do not review alternatives that are not within the scope of the applicant's proposals. Similarly, the Federal agencies do not compel a permit applicant to alter its proposal or its purpose and need, but instead they decide whether a permit is appropriate for the specific proposal as the applicant envisioned it. It is not for the agencies to run the applicant's business or to compel an applicant to change its proposal: DOE evaluates the project as offered. Therefore, in an applicant-initiated process, the range of reasonable alternatives analyzed in detail is limited to those alternatives that would satisfy the applicant's purpose and need and that the applicant would be willing and able to implement, plus the no-action alternative. All of the alternatives analyzed in this EIS were either suggested by or similar to alternatives suggested by TEP.

This approach is particularly apt where, as here, the proposed action reflects a state's decision as to the kind and location of electrical infrastructure it wants provided within its boundaries. The ACC is vested with the authority to decide how it believes energy should be furnished within Arizona's borders, including the need for, the location of, and the effectiveness of transmission lines within its borders. See the discussion at Section 1.1.2 and 1.2.2 of the EIS with respect to the respective jurisdictions and authorities of the state and Federal agencies, and their relationship to this NEPA review. TEP's proposal has the dual purpose of addressing problems of electrical reliability in Santa Cruz County, Arizona, and crossing the border to eventually interconnect with the Mexican electrical grid. Alternatives that would not satisfy both elements of this dual purpose are not reasonable alternatives for the Federal agencies to consider in detail.

Thus, during the course of this NEPA review, the Federal agencies have considered alternative routes for TEP's proposed transmission line, but have not deemed feasible proposed alternatives that contemplate construction of power plants or transmission lines that differ in capacity from those that the ACC has directed TEP to construct.

Comment No. 2 (continued)

The original ACC Decision No. 62011 (ACC 1999) mandates the construction of a second transmission line to serve customers in Santa Cruz County and does not reference the export of electricity to Mexico. However, a second ACC order (Decision No. 64536, issued in January 2002) grants a CEC to TEP to construct only a 345-kV transmission line with the dual purpose of addressing the service reliability problems in Santa Cruz County and providing interconnection with Mexico. Alternatives that would not satisfy both elements of TEP's dual purpose are not reasonable alternatives for the Federal agencies to consider in detail.

Comment No. 3

As discussed above in response to Comment 1, the Federal agencies recognize that many people value the sense of place that exists along areas of the alternative transmission corridors because of the areas' natural beauty, undisturbed landscape features, abundant plant and animal wildlife, and cultural resources. The Federal agencies appreciate this holistic sense of place and have revised the introductory sections of Chapters 3 and 4 of the Final EIS to acknowledge these values.

Sections 3.2 and 4.2 discuss the existing visual resources and analyze the potential impacts to these resources from the proposed project in the areas cited by the commentor. Refer to the response to Comment 1 above regarding impacts to cultural resources and conservation and restoration efforts.

The Federal agencies recognize that many people value certain areas along the alternative transmission corridors as wild places and have a holistic concern for the natural beauty, undisturbed landscape features, and abundant plant and animal wildlife that characterize those areas. These unique natural characteristics give such wild areas their "sense of place," which includes peoples' visual and aural perceptions of the area's undisturbed sky, natural landscape, water resources, and plant and animal populations. The sense of place also includes the spiritual value that many people associate with these wild areas because of their cultural and religious significance. The Federal agencies recognize and appreciate this holistic sense of place and have revised the introductory text of Chapters 3 and 4 of the Final EIS to acknowledge these values.

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These transmission lines will have numerous and far-reaching adverse impacts upon the residents and resources of the area. For example, Nogales and other towns in the area rely on tourism as a main source of revenue. A large part of this revenue comes from birdwatchers, bikers (both motor and self-propelled), hikers and other people who visit the area because of its natural scenery. If these lands are adversely impacted to the point where they become undesirable for recreation, Santa Cruz will lose a great deal of annual revenue.

5

The draft environmental impact statement as written is fundamentally flawed. The alternatives, as described, are essentially all one and the same, with a few different routes. In this case, you have allowed the project proponent, Tucson Electric Power, to completely define the purpose and need for the project, rather than defining it based on the needs of the community of Nogales and southern Santa Cruz County.

The residents of Nogales are in need of a regular and reliable power source, however, this power does not need to come in the form of a high power transmission line with 140 feet tall towers marring the landscape. Instead, there are other ways to accomplish improved power for the City of Nogales and Santa Cruz County. For example, a lower voltage transmission line traveling south on the existing utility corridor along I-19 was not examined as an alternative. Because the town is only in need of a 115 kV line, and this is all that TEP was required to provide under the direction of the Arizona Corporation Commission, a lower voltage line could have easily fulfilled this need. Lower voltage lines are also more easily buried, thus lessening their environmental and visual impact.

Another viable option would be the construction of a powerplant in the vicinity of Nogales, which would be more efficient in solving power needs. A local powerplant would also be significantly cheaper for residents who will ultimately pay for the line. I understand that the proposed 345 kV powerline will cost approximately \$85 million, while a smaller line, would only cost about \$20 million. Santa Cruz County electrical rates increased 22% last month, in part to pay for the transmission line. The residents of Santa Cruz County, which is already one of the most economically depressed counties in the state, will have to pay for this transmission line, even though 80% of its capacity will be used to trade power with Mexico.

6

I am also concerned about the reliability of the U.S. power grid should it be linked to Mexico's. As exemplified by the recent power failures in the Eastern United States, grid failures can have catastrophic consequences. It is not well-known what the impact to reliability will be if and when the Mexican and U.S. grids are connected. Tucson Electric Power has itself testified that Mexican electrical systems do not comply with U.S. reliability, synchronization, personnel, or training standards. We can not be sure that this project will not in the end make power less reliable in Santa Cruz County. We should be increasing local supply and independence, improving efficiency and promoting the use of renewable energy sources instead of continuing the flawed power grid approach, which can break down easily and without warning with far-reaching consequences.

Comment No. 4

Sections 3.5 and 4.5 discuss the existing socioeconomic resources and address potential socioeconomic impacts as a result of the proposed project. Section 3.5 has been revised in the Final EIS to describe existing socioeconomic aspects of tourism in the project area. Section 4.5 has been revised to discuss potential impacts to socioeconomic aspects of tourism.

Comment No. 5

As discussed in Section 2.1.5, a new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal) because it would not meet TEP's dual purpose and need of benefiting both southern Arizona and Mexico. Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS (also refer to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

After a regulated utility such as TEP constructs a project in Arizona, the ACC determines whether or to what degree an investment by a utility is recoverable through consumer electricity rates. Because the Federal agencies cannot anticipate how the ACC may adjust consumer electricity rates in light of the proposed project, the potential change in consumer electricity rates is too speculative for inclusion in the EIS. There have been no rate increases attributable to this proposed project.

Section 3.13 discusses minority and low-income populations in the vicinity of the proposed project, including Santa Cruz County. Section 4.13 concludes that there would be no disproportionately high and adverse impacts to minority or low-income populations.

Comment No. 6

As part of DOE's decisionmaking process on whether to grant a Presidential Permit for the proposed project, DOE will determine whether the proposed project would adversely impact the reliability of the U.S. electric system. Also, before authorizing exports to Mexico over the proposed 345-kV facilities, DOE must ensure that the export would not impair sufficiency of supply


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I do not support the proposed routes because they do not serve Santa Cruz County's interests, as originally intended under the Arizona Corporation Commission order. Instead, the transmission lines will be an unnecessary economic, environmental, and cultural burden on Southern Arizona. I also do not believe that the concerns of residents and visitors who utilize the area for recreation and other interests have been adequately considered or addressed.

7 I urge the proponent of the project to strongly reconsider its desire to move forward with this project. Currently, TEP enjoys a "good neighbor" reputation in the Tucson area because of its desire to work with local people to accomplish common goals. However, this proposed project will tarnish TEP's reputation because the project so clearly contradicts the desires of local residents and will destroy so much of the beauty and natural heritage in the region.

I am willing to work with your agency and the proponent of the project to determine a more sensible course of action that would provide power for the citizens of Santa Cruz County while protecting the important cultural and natural values of the area. However, I am not willing to endorse the destruction of our natural resources in this manner.

Sincerely,


Raúl M. Grijalva
Member of Congress

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Comment No. 6 (continued)

within the United States and would not impede, or tend to impede, the coordinated use of the regional transmission system.

Comment No. 7

The Congressman's opposition to the proposed project is noted. Responses to comments 1 through 6 above address the Congressman's specific concerns.

Crown C Ranch
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August 20, 2003

CROWN C RANCH
P.O. BOX 505

SONOITA, ARIZONA
85637


received
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For Mr. Pell -

I appreciate your keeping me informed regarding the Tucson Electric Power Company Sahuarita-Nogales Transmission Line. The impact and consequences of this line are of utmost importance to those of us who live in Santa Cruz County.

It is my understanding that TEP has been directed by the Arizona Corporation Commission to pursue the Western Corridor - despite the fact that this corridor is the least cost effective and most environmentally damaging corridor. The Central Corridor, along which there are already existing power lines, seems to have been put aside due largely to the objections and directions of an obviously very influential individual in this area. This direction does not consider logic or the concerns and opinions of other interested, taxpaying citizens.

I hope that your office is well aware of this situation and is seriously considering the advantages of the Central Corridor.

Sincerely, 

Comment No. 1

The Central Corridor remains a viable alternative for selection by the Federal decisionmakers in their respective Records of Decision (RODs), or latter of concurrence in the case of the USIBWC (see Section 1.6.6). Implementation of the proposed project in the Central Corridor could not occur until TEP meets all regulatory requirements, including obtaining the necessary approval from the ACC.

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<p align="center">DECONCINI McDONALD YETWIN & LACY A PROFESSIONAL CORPORATION ATTORNEYS AT LAW 2325 EAST BROADWAY BOULEVARD ■ SUITE 200 ■ TUCSON, ARIZONA 85710-5300 (520) 322-5000 ■ (520) 322-5585 (Fax)</p>	
<p>EVO DI CONCINI (1951-1980)</p> <p>JOHN B. McDONALD RICHARD M. YETWIN JOHN C. RICHARDSON STENGER A. SMITH DENISE M. BARTON WAYNE E. YEHUNG SHILLTON L. FREEMAN JEFFREY M. SIMMONS LISA ANNE SMITH CHRISTINA URRAS NANCY J. WITCH SHICHAJI MILOZATICH-DESAI STACY NUYECHT BUTLER</p> <p>RICHARD C. KATZ - OF COUNSEL SARA J. VANCE - OF COUNSEL THOMAS G. ARMOUR - OF COUNSEL</p>	<p>2025 NORTH THIRD STREET, SUITE 200 PHOENIX, ARIZONA 85004-1472 (602) 282-2920 FAX: (602) 282-2620</p> <p>917 1ST STREET, NE WASHINGTON, D.C. 20002-7307 (202) 545-0800 FAX: (202) 545-5044</p> <p>www.deconcinimcdonald.com</p> <p>October 14, 2003</p> <p>PLEASE REPLY TO TUCSON</p>
<p><u>via FAX and First Class Mail</u></p> <p>Jerry Pell, Ph.D., CGM NEPA Document Manager Fossil Energy FE 27 U.S. Department of Energy Washington, DC 20585</p> <p>Re: Tucson Electric Power Company Sahuarita-Nogales Transmission Line Draft Environmental Impact Statement (DOE/EIS-0336)</p> <p>Dear Dr. Pell:</p> <p>I write on behalf of the Croll family, owners of the Sopori Ranch in southern Arizona. The Western, Central and Crossover Corridors of the proposed project all pass through the Ranch. Since the Crossover Corridor would follow the same path as the Western Corridor in the vicinity of the Ranch, we will confine our comments to the Western and Central Corridors.</p> <p>The Croll family believes that if the proposed project must be built, the Western Corridor is the only currently proposed route that they can support. For the reasons that follow, we support DOE's identification of the Western Corridor as its preferred alternative.</p> <p>On page S-17 of the EIS Summary, the authors comment that the Central Corridor would be "intermittently visible to more residents given its closer proximity to the towns of Amado, Tubac, and Tumacacori" than the Western Corridor. We believe that comment, and particularly the use of the descriptor "intermittent," seriously understates the impact that a transmission line would have on the region of the Central Corridor. A transmission line on the Central Corridor would be permanently visible to far more residents than a transmission line on the Western Corridor. It is perhaps even more important to realize that a transmission line on the Central</p>	

Comment No. 1

Sections 3.2 and 4.2 present analyses of the existing visual resources and potential impacts to these resources, respectively. The reference to "intermittent" visibility (text referenced by the commentor in the Summary and Sections 2.3 and 4.2 of the Draft EIS) has been clarified to reflect that it refers to the views of the proposed project by travelers on I-19, rather than to intermittently changing views of the proposed project from a single fixed point such as a residence. In addition, a cross reference has been added in Section 4.2.2 to the analysis in Section 4.4.1.2 of potential visual impacts on historic parks in Tumacacori and Tubac.

The permanent area of disturbance from the proposed project along the gas pipeline would be the footprint of the proposed structures, and the access roads required for ongoing maintenance of the transmission line. The required 100-ft (30-m) distance between the edge of the gas pipeline right-of-way (ROW) and the proposed transmission line structures would not result in a 100-ft (30-m) wide strip of cleared, disturbed land, but rather discrete areas of disturbance for each transmission line structure and any required access roads.

The Federal agencies recognize the importance of riparian areas, therefore the Federal agencies have relied on Harris Environmental Group (HEG) to review aerial photography of the corridors and calculate the acreage of the Sonoran Riparian Deciduous Forest. Impacts to the Sonoran Riparian Deciduous Forest for the entire Central Corridor, including Sopori Ranch, are discussed in Section 4.3.2.2.

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1 cont.	<p>Corridor would be visible from Tumacacori National Historical Park and Tubac Presidio State Historic Park. A transmission line on the Western Corridor would not be visible from, and therefore would preserve, those important cultural resources.</p> <p>On page S-20 of the EIS Summary, the authors comment that a minimum distance of 100 ft would be maintained between any of the proposed transmission line structures and the edge of the existing El Paso Natural Gas pipeline right-of-way. The effect of this parameter would be a tremendous expansion of the area currently disrupted by the existing gas pipeline. The disrupted area would expand to include not only the width of the transmission line right-of-way, but also a 100 foot wide strip between the gas pipeline right-of-way and the transmission line right-of-way. This parameter significantly reduces any possible benefit to be derived from the fact that the Central Corridor parallels the gas pipeline.</p> <p>We believe that construction of a transmission line on the Central Corridor would be much more harmful to the Ranch, and to persons and property in the region generally, than on the Western Corridor. The Central Corridor is much closer to valuable riparian areas and inhabited buildings on the Ranch. It is also in much closer proximity than the Western Corridor to significant historical and cultural components of the Ranch.</p> <p>The theoretical disadvantages of the Western Corridor identified in the EIS are not nearly as meaningful to the inhabitants of the area as the very real impacts discussed above that would result from construction on the Central Corridor. We therefore support the DOE's identification of the Western Corridor as its preferred alternative.</p>		
2	<p>In addition, we have a number of specific comments about the Draft EIS:</p>		
3	<p>1) Figure 2.1-2 is missing. We cannot determine if Elias Draw is the primary route south from Arivaca Road to the National Forest.</p> <p>2) We wish to state that based on our knowledge of the land, the size of the 100-yr floodplain for Sopori Wash in Figure 3.7-3 and Appendix C, Figures 1, 3 and 4, are based on FEMA data that are out of date, over-generalized, and lacking precision. The complete data source for the floodplain figures should be noted.</p>		
4	<p>3) We desire that DOE recommend monopoles over lattice towers for construction of the line over Sopori Ranch. TEP told us monopoles would be used.</p>		
5	<p>4) In Section 3.2.2 "Central Corridor Outside Coronado National Forest" 1) Paragraph 2, after second sentence: Add that the line passes within one-tenth mile of the Sopori's Farmer's Family's residence at Sopori Ranch (husband, pregnant wife, 1 young boy), and</p>		

Comment No. 2

Figure 2.1-2, located on page 2-4 of the Draft EIS, shows major roads in the area. Ellas Draw is a land depression that runs roughly north/south between Arivaca Road and the Coronado National Forest Tumacacori EMA. Ellas Draw does not contain any roads, and is thus not shown or labeled on the map. Figure 2.1-2 is also included in the Final EIS with the same figure number. The Central Corridor is just east of Ellas Draw.

Comment No. 3

The 100-year floodplain for Sopori Wash shown in Figure 3.7-3 and Appendix C is the best data available. Federal Emergency Management Agency (FEMA) data was used. Analysis for the 500-year floodplain has also been added to the Final EIS (see Appendix C). Section 4.7.1 of the EIS, Floodplains, Wetlands, and Surface Water, discusses the methodology used to identify the boundaries of floodplains. Specifically for Sopori Wash, the floodplain boundaries were identified using the FEMA Flood Insurance Rate Maps, representing the best available data for this area.

Comment No. 4

As discussed in Section 2.2.3, Transmission Line Structures and Wires, the primary support structures to be used for the transmission line would be self-weathering monopoles, and dulled, galvanized steel lattice towers would be used only in specific locations for engineering reasons or to minimize overall environmental impacts (for example, impacts to soils or archaeological sites) in accordance with ACC Decision No. 64356 (ACC 2002). TEP would select and site the support structures within the ROW after each agency has issued a ROD, and TEP would consider input from cultural, biological, visual specialists, and landowners to identify and minimize impacts to each area of land to be disturbed.

Comment No. 5

As a condition of the Certificate of Environmental Compatibility issued by the ACC to TEP in January 2002 (ACC 2002, see Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona

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5 cont.	<p>¼ mile of the Agua Linda cow camp at Sopori Ranch (west of the Agua Linda interchange). 2) Paragraph 3, before last sentence: Add that between Arivaca Road and Tubac, the existing scenic integrity of the landscape is high. And pursuant to this last statement, we feel that measurements of visual impacts should not only be made from I-19, but from the higher elevation fee title private land west of I-19, whether or not it is currently developed. We recommend the EIS include a picture taken from the Prospect Hills, 4 miles west of I-19, on Sopori Ranch that will illustrate the high scenic quality of this land.</p>
6	<p>5) In Section 3.2.1 "Western Corridor Outside Coronado National Forest", paragraph 1 does not discuss the scenic impact of the power line between the separation of the central and west routes south to the Forest beyond saying that it is high. Again, the scenic impacts from viewpoints other than I-19 need consideration, though the "High" quality conclusion is correct. Also, we feel the sentence order in this paragraph is confusing, as it should follow the route itself.</p>
	<p>6) In Section 3.4.1.1 "Western Corridor Cultural Resources", paragraph 3 notes two sites near Sopori Wash shown in Figure 3.7-1. This Figure does not show these sites.</p>
	<p>7) In Section 3.12.2 "Access to ROW on Central Corridor", Sopori Ranch does not foresee granting this access from the frontage road. We will oppose any effort to build the transmission line on the Central Corridor.</p>
5 cont.	<p>8) In Section 4.2.1 "Outside of the Coronado National Forest", paragraph 3 needs description of the extent, in miles, of the visual impact on Sopori Ranch from areas other than I-19 and Arivaca Road because of the large degradation we feel would occur. A simple analysis of line segments on major paved roads does not complete this analysis. A lot of higher ground exists on Sopori Ranch that makes viewing the line much easier, creating additional negative impacts for Sopori Ranch.</p>
	<p>9) In Figure 4.2-4, we object to this type of analysis being complete because of its bias towards paved roadways and against unpaved roadways, and land without roads now that may have roads in the future.</p>
	<p>10) In Section 4.2.2 "Outside of the Coronado National Forest", 1) paragraphs 2 and 3 also need to state that between Amado and Tubac (all on the Sopori Ranch) the line would pass across a major wash, through a historic farm, across large distances of high elevation, high scenic value, wide-open views, past the Agua Linda cow camp used by movie companies for its scenic beauty, and through much scenic land surrounding Tubac impacting the eye-drawing views of the Tumacacori Mountains. 2) In addition, we challenge paragraph 6, where the characterization of scenic value as moderate in this</p>

Comment No. 5 (continued)

Corporation Committee, of the Final EIS), TEP would be obligated to "meet and confer with landowners who are within or adjacent to the Route Corridor and other interested parties in order to develop a plan for specific pole locations that will mitigate the environmental and visual impact of the Project transmission lines within the Route Corridor." Consistent with this obligation, TEP would meet with each landowner and discuss impacts to their particular property, including any issues that a particular landowner has before finalizing the alignment of the transmission line within the corridor considered in this EIS and the location of access roads. This mitigation measure has been added to Section 2.2.6.

The level of detail requested is too much to include in an EIS. Relative to land use, the purpose of an EIS is to disclose the potential impacts to land use that would result from the proposed project and determine the overall compatibility with land use plans. Regarding the order of the sentences in paragraph 1 of Section 3.2.1, Outside the Coronado National Forest, cited by the commentator, the order of the sentences follows the route from north to south as closely as possible.

On the topic of visual impacts, because the area between Arivaca Road and Tubac includes such features as houses, it is altered from its natural state and therefore does not qualify for classification as having high Scenic Integrity (defined as "appears to be intact"). Its classification as having moderate Scenic Integrity (defined as "appears slightly altered"), as stated in Section 3.2.2, is accurate.

In assessing the visual impacts of the proposed project, for consistency the agencies used the same methodology for all portions of each of the alternative corridors. The visual analysis is based on definitions and criteria developed under the USFS Scenery Management System (SMS). Different people may have different aesthetic judgments, but consistent use of the SMS ensures that visual impacts are evaluated consistently. The FEIS has been further supplemented to include a visual analysis conducted under the former USFS Visual Resource Management System (see Appendix I). The visual analysis is supplemented with photo simulations of project structures. The photo simulations in the EIS do not constitute an analysis of visual impacts, but are included to portray the range of possible impacts of the proposed project, from wide-open to partially blocked views at a range of

DeConcini McDonald Yetwin & Lacy, P.C.

Page 4 of 5

OCT-14-03 TUE 03:47 PM	DECONCINI McDONALD	FAX NO. 5203225585	P. 05
DeCONCINI McDONALD YETWIN & LACY A PROFESSIONAL CORPORATION ATTORNEYS AT LAW			
Jerry Pell, Ph.D. October 14, 2003 Page 4			
5 cont.	area describes only the developed areas right near Arivaca road, and not the eight miles of undeveloped land between Arivaca Road and Tubac. This land clearly has High scenic integrity.		
11)	Overall, we feel that the scenic evaluation of line impacts on Sopori was done poorly. In fact, it was barely addressed at all apart from the paved roads along the edges of the ranch.		
12)	In Sections 4.5.1 and 4.5.2, "Socioeconomic Impacts..." and 8.1, "Short Term Use and Long Term Productivity", we feel that DOE has done a grave disservice to the Sopori Ranch in particular and to private landowners in general by neglecting to emphasize the transmission line's negative impacts on the value of large private undeveloped land holdings. In 8.1, the report notes, "A large portion of each alternative crosses undeveloped land, impacting long term preservation of unaltered landscapes." However, the report does not state the negative impacts to property values for uses other than long term preservation, namely, development. This is the primary concern of the Sopori Ranch. Both the central and western corridors cross miles of private land. The lines would be visible from miles outside the ROW. The difference between selling land that does not view a large power line, and land that does, is highly significant in monetary terms. We feel that this point must be made explicitly in 4.5.1, 4.5.2, and 8.1. That this issue receives such non-recognition in an EIS is appalling. If DOE feels it necessary to discuss the reduction in recreation opportunities in the Forest, it ought to be even more descriptive about the impacts on land owners who view development as the highest and best use of all or a portion of their lands. Furthermore, in Section 4.5.1, the line's impact on land values for future development must be made more fully and descriptively in discussing the appraisal process. In particular, only one sentence in 4.5.1 references the issue of negative visual impacts on property owners. It is the last sentence of paragraph 4, in subsection "New Transmission Line ROW and Access Roads." That sentence does not discuss whether a negative visual impact on lands outside the ROW is compensable in the appraisal process. The matter is further in doubt because the last sentence of paragraph 5 seems to imply that only in cases of severance are negative impacts outside the ROW considered in the appraisal process. Any fair minded and objective observer would realize that the single biggest impact of this line occurs because of negative visual impacts. Your large (if deficient) section on visual impacts proves the importance of the issue. Yet your sections on the socioeconomic impacts and long term productivity barely discuss how these negative impacts will be compensated. Therefore, we strongly feel that the Final EIS needs to rework and add to those sections referenced here to take into account the negative impact of the TEP line on the value of undeveloped land with development potential lying outside the ROW.		
7			

Comment No. 5 (continued)

distances, covering the most likely viewing areas. The photo simulations are useful only when accompanied by descriptions of the vegetation and land use, SMS Scenic Integrity values, and maps of visibility and various visual attributes, to support the analysis of visual impacts. Mapping of project visibility was performed from major, paved roadways because these areas would have the highest concentration of viewers.

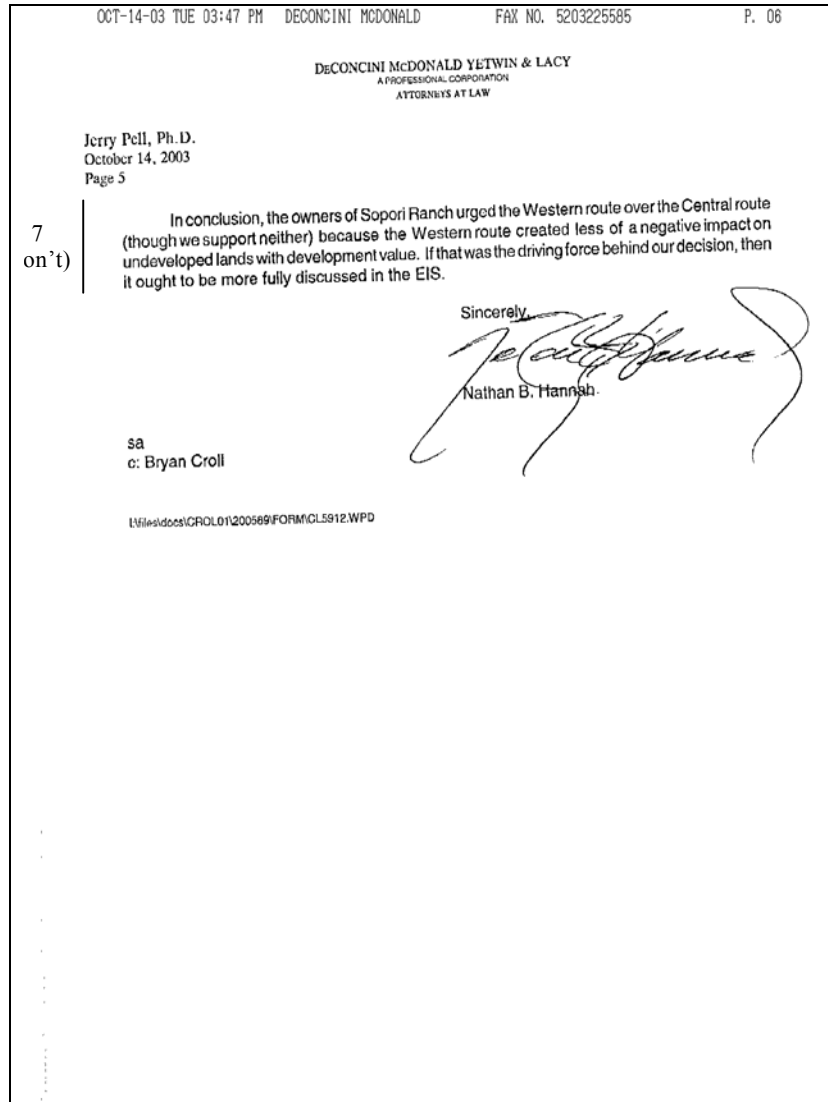
Comment No. 6

Federal agencies are granted the authority to withhold from public disclosure information about the location of a historic property when the Federal agency has determined that harm to the property may occur (36 CFR 800.11 [c]1). An EIS does not present the exact locations of cultural resources (including historical sites, archaeological sites, and traditional cultural properties) in an effort to help preserve those sites from vandalism and theft. In Section 3.4.1.1, Western Corridor, the reference to Figure 3.7-1 is to show the approximate location of the intersection of the Western Corridor and Sopori Wash, not to identify the exact locations of the cultural sites.

Comment No. 7

Any decrease in property values from the proposed transmission lines would be perception-based impact, that is, an impact that does not depend on actual physical environmental impacts resulting directly from the proposed project, but rather upon the subjective perceptions of prospective purchasers in the real estate market at any given time. Any connection between public perception of a risk to property values and future behavior would be uncertain or speculative at best, and therefore would not inform decisionmaking. Section 4.5 references a discussion of past studies of the impact of transmission lines and property values in other geographic areas. The studies conclude that other factors, such as general location, size of property, and supply and demand factors, are far more important criteria than the proximity of a transmission line in determining the value of residential real estate. Accordingly, while the Federal agencies recognize that a given property owner's value could be affected (positively or negatively) by the project, the Federal agencies have not attempted to

DeConcini McDonald Yetwin & Lacy, P.C.
Page 5 of 5




Comment No. 7 (continued)

quantify theoretical public perceptions of property values should the proposed project be built.

Regarding consideration of visual impacts to lands either within or outside of transmission line or access road easements during the appraisal process, TEP would negotiate with each individual landowner in accordance with the requirements of the ACC (see the response to Comment 5 above). If implementation of the proposed project requires condemnation of private lands (in the case that an easement agreement cannot be reached with the land owner or manager), such condemnation would be subject to separate legal proceedings which provide due process for those affected.

Escalante Wilderness Project
Page 1 of 1



Escalante Wilderness Project
 Southern Arizona Office
 Po Box 42, Arivaca AZ 85601
 10 October 2003

Fossil Energy FE-27, US Department of Energy
 1000 Independence Avenue, SW
 Washington DC 20585

RE: DOE/EIS-0336, Tucson Electric Power Co. Sahuarita-Nogales Transmission Line

Please note the change of address above.

1

The Escalante Wilderness Project, which advocates for wildlands protection, and myself as a resident of the Arivaca area, strongly oppose all three action alternatives that were considered in the July 2003 DEIS.

2

Although the AZ Corporation Commission and DOE "must" meet the energy needs of Santa Cruz County/Nogales, those needs do not have to be met by Tucson Electric Power Company nor by the routing of transmission lines through our National Forest.

3

The DEIS does not reveal the location of TEP's power generation plant, nor does it analyze the environmental impact of TEP's proposed increase in power generation. The DEIS does not analyze whether the expressed need for increased power could be met by conservation efforts or by a power plant (either conventional or utilizing sustainable solar or wind generation) located near Nogales. These alternatives would prevent environmental impacts to the National Forest and would decrease environmental impacts to residential areas; conservation and/or "alternative" power generation would greatly decrease all environmental impacts.

2
cont.

4

We oppose any new impact on this finite, ecologically valuable, and highly scenic unit of the Coronado National Forest. We note that the section following the Ruby Road would destroy the wildness experienced by people traveling this very popular and scenic back road, while the Crossover route through Peck Canyon would totally destroy the wild character of a relatively pristine canyon. We have not personally explored the "Central" route, but object to all National Forest routes because any destruction of wild or wilderness character or ecological values of our public forest lands is unconscionably shortsighted.

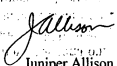
5

We incorporate by reference the comments of Arivaca resident Mary Kasulaitis (including her copious scoping comments which were largely ignored in the DEIS, and comments made by Peter Ragan and John Rueb at DOE's public hearing in Green Valley and published in the October 2003 issue of the Arivaca newspaper *The Connection*).

2
cont.

None of the three proposed routes is acceptable. **We urge DOE to choose the No Action alternative**, and to encourage power companies to submit proposals that could meet the energy needs of Santa Cruz County in less environmentally destructive ways.

Sincerely,


 Juniper Allison

cc: John M. McGee, Forest Supervisor

Comment No. 1

The commentor's opinion is noted.

Comment No. 2

The ACC is vested with the state's authority to decide how it believes energy should be furnished within Arizona's borders (for example, the need for and effectiveness of transmission lines within its borders). Refer to the revised text in Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona Corporation Committee, of the Final EIS that provides explanation of the jurisdictions and authorities of the state and Federal agencies, and their relationship to this NEPA analysis.

Section 1.2 of the Final EIS has been revised to explain the roles of the Federal agencies in developing alternatives to accomplish the purpose and need. Energy conservation and/or alternative power supply means would not meet TEP's proposal and are thus not evaluated in this EIS (see Section 2.1.5 for a discussion of Alternatives Considered but Eliminated from Detailed Study). The EIS evaluates a range of reasonable alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal. A segment of each of the alternative routing options proposed by TEP crosses Coronado National Forest land, and the affected environment and potential environmental impacts of crossing Coronado National Forest land are analyzed in the EIS. As explained in Section 2.1.5, alternatives that do not cross National Forest lands were considered but eliminated from detailed study.

Comment No. 3

Section 3.11.1 of the Final EIS has been revised to clarify that the proposed project does not include the development or expansion of power generation facilities. The proposed project would utilize existing power on the Western electric grid.

Comment No. 4

The existing biological resources of the Coronado National Forest are described in Section 3.3. Section 4.3 describes potential impacts to biodiversity and wildlife populations. The Final EIS describes impacts by corridor, as listed in Tables 4.3-1, 4.3-2, and 4.3-3.

Sections 3.2 and 4.2 describe the existing visual resources and analyze potential impacts to these visual resources for each alternative. With respect to the Crossover Corridor in Peck Canyon, Section 3.2 indicates that the existing Scenic Integrity, or the degree of intactness and wholeness of the landscape, is Very High within Peck Canyon. As stated in Section 4.2.3, upon implementation of the Crossover Corridor, the Scenic Integrity of most of the affected area of Peck Canyon would be reduced to Low. Section 4.2 also notes that there are recreational trails within Peck Canyon from which the Crossover Corridor would be in the foreground.

Comment No. 5

The Federal agencies considered all comments received during the NEPA process, including those cited by the commentor. All of these comments are available to the Federal decisionmakers in reaching final decisions on this project.

Friends of Arizona Rivers

Page 1 of 1

Tucson Elec Pwr Sahuarita-Nogales Transmission line DEIS

From: Tim Flood [SMTP:tjflood@att.net]
To: Pell, Jerry
Cc: Matt Skroch

Subject: Tucson Elec Pwr Sahuarita-Nogales Transmission line DEIS

Sent: 10/14/2003 10:58 AM

Importance: Normal

1 | Dr. Jerry Pell, Office of Fossil Energy
| re: Tucson Electric Power Sahuarita-Nogales Transmission line DEIS
| 1. The DEIS does not describe the need for this project, and who would
| benefit. This issue should be better described before making a decision
| about siting the line.

2 | 2. Less environmentally damaging alternatives should be given stronger
| consideration.

Thank you,
Tim Flood, Conservation Coordinator
Friends of Arizona Rivers
503 E Medlock Dr
Phoenix, AZ 85012

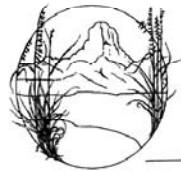
Comment No 1

The EIS has been revised to include a more extensive explanation (in Section 1.2, Purpose and Need) of the needs that the proposal would address and the roles of TEP and the Federal agencies in developing alternatives for the proposed project.

Comment No 2

As discussed in the response to comment No. 1, the EIS evaluates a range of reasonable alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal. The EIS also assesses the No Action Alternative, under which the transmission line would not be built and the associated environmental impacts would not occur.

Friends of Buenos Aires National Wildlife Refuge
Page 1 of 1



**Friends of Buenos Aires
National Wildlife Refuge**

PO BOX 65855 TUCSON AZ 85728

October 9, 2003

Jerry Pell, Ph.D., CCM
NEPA Document Manager
Office of Fossil Energy, FE-27
U.S. Department of Energy
1000 Independence Ave., S.W.
Washington, D.C. 20585

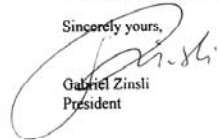
Dear Dr. Pell,

Friends of Buenos Aires National Wildlife Refuge is a group of 150 citizens dedicated to the support of activities centered around Buenos Aires National Wildlife Refuge, located in southwestern Pima County. The Board of the Friends group is in receipt of the Tucson Electric Power Company Sahuarita-Nogales transmission line draft EIS. We are strongly skeptical about this whole project and its impact on the US-Mexico border area.

- 1 We are not convinced there is a need for this new transmission line. In particular, we strongly object to the planned Western Route of the lines. The Western Route intrudes into the Coronado National Forest and comes too close to Sycamore Canyon Wilderness Area. The planned line will have a negative impact on the visual quality of the area. In addition, the roads along the utility corridor would lead to increased vehicular traffic, which would negatively impact air quality and wildlife habitat of those beautiful hills.
- 2 In conclusion we strongly favor the "No Action" alternative which would result in no construction of this questionable project.

Thank you for considering our input.

Sincerely yours,



Gabriel Zinsli
President

Comment No. 1

The Federal agencies recognize that many people value certain areas along the alternative transmission corridors and have a holistic concern for the natural beauty, undisturbed landscape features, abundant plant and animal wildlife, and cultural resources that characterize those areas. These unique natural characteristics give such areas their "sense of place," which includes the spiritual value that many people associate with these areas because of their cultural and religious significance. The Federal agencies recognize and appreciate this holistic sense of place and have revised the introductory sections of Chapters 3 and 4 of the Final EIS to acknowledge these values.

The agencies recognize that the natural and cultural characteristics that contribute to a sense of place cannot be measured in the same manner as some other resources in an environmental analysis. However, in order to analyze potential impacts effectively and document the analysis, it is necessary to consider the resource areas individually. Thus, the EIS discussions of affected environment in Chapter 3 and potential impacts in Chapter 4 are divided into distinct resource areas (e.g., visual resources, biological resources, cultural resources).

Regarding the need for the project, Section 1.1.2 of the Final EIS provides explanation of the jurisdictions and authorities of the state and Federal agencies, and their relationship to this NEPA analysis. It is not for the Federal agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. The Federal agencies' purpose and need are discussed in Section 1.2.

Section 3.1.1.1, Land Use, discusses the affected environment of Pajarita Wilderness, which encompasses Sycamore Canyon. The structure locations, construction areas, and proposed access roads for all three corridors would not enter into the Pajarita Wilderness. Sections 3.2.1 and 4.2.1 present analyses of the existing visual resources, and potential impacts to these visual resources for the Western Corridor. The analysis determined that the existing scenic integrity of the Pajarita Wilderness would not change.

Comment No. 1 (continued)

The potential for changes in access in the vicinity of the proposed project, which includes vehicular traffic on access roads, is discussed in Section 4.1.2, Recreation. The potential for fugitive dust associated with the proposed project is discussed in Section 4.8, Air Quality.

As discussed in Sections 4.1.2, Recreation, and 4.12, Transportation, there would be two classifications of roads: temporary roads that are required only for construction of the project, and roads that are required for ongoing maintenance of the project. Roads that are required for ongoing maintenance by TEP would be administratively closed. Road closures would limit vehicular traffic to occasional access by TEP, mitigating potential impacts on air quality or wildlife habitat.

Comment No. 2

The commentor's opinion is noted.

Green Valley Community Coordinating Council,
Environmental Committee
Page 1 of 1

September 25, 2003

To: Dr. Jerry Pell
Office of Fossil Energy (FE-27)
U.S. Department of Energy
Washington, DC 20585

From: Allan H. MacDonald
Chair, Green Valley Community Coordinating Council (GVCCC) Environmental
Committee

**Subject: Comments on the Department Of Energy's Tucson Electric Power (TEP)
Company Sahuarita-Nogales Transmission Line Draft Environmental Impact
Statement (EIS).**

In my role as chair of the GVCCC Environmental Committee, I asked Jeanne Welch, an archeologist and engineer residing in Green Valley, Arizona, to review the subject EIS. Jeanne invited Paul Frick to participate. Paul is a Green valley resident with an MS from the University of Arizona based on his surveys in the Santa Cruz River Basin. Their comments are presented in the following paragraph.

1

"Paul and I have reviewed the Draft EIS for the TEP Transmission lines. The proposed Western Corridor in the vicinity between McGee Ranch Road, Demetric Wash and Esperanza Wash traverses an area where there were burials when the Cave was dug by Dr. Emil Haury. In addition, the Sopori Wash area and the west side of the Tumacacori Mountains hold potential for additional Hohokam cultural resources. We suggest that in accordance with Federal Regulations an intensive cultural resource survey be carried out to ascertain precisely, information on the appearance, significance and integrity of any cultural resources in the project area sufficient to permit an evaluation of significance for the National Register of Historic Places (NHRP)"

Since this work was done at my request, the results and suggestions offered by Jeanne and Paul have my support.

Sincerely,



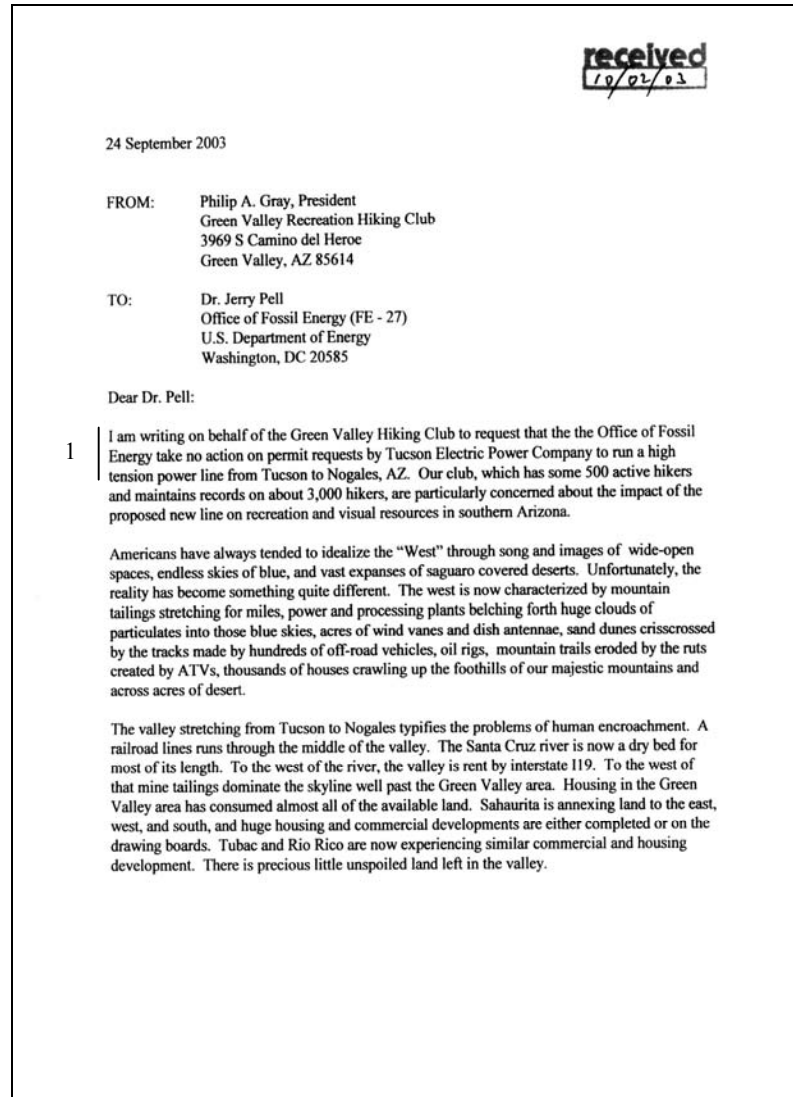
Allan H. MacDonald

Comment No. 1

All Federal agencies involved in this project are committed to fulfilling their obligations under the *National Historic Preservation Act*, *Native American Graves Protection and Repatriation Act*, *American Indian Religious Freedom Act*, and associated Executive Orders addressing Native American rights. The Federal agencies are developing a Programmatic Agreement with the Arizona State Historic Preservation Office (SHPO), interested tribes, and TEP guiding the treatment of cultural resources if an action alternative is selected.

A full-pedestrian survey of the entire corridor selected would be conducted prior to any ground-disturbing activities. Based on the results of the survey, the Federal agencies would require monitoring in areas with sensitive or potentially sensitive cultural resources. No monitoring has been proposed at this time because the extent and nature of cultural sites have not been fully determined. Monitoring may include an archaeologist onsite during ground disturbing activities or inspection of work areas. TEP has committed to avoiding National Register-eligible sites when possible. In the event a site is unavoidable, a Testing Plan, and if necessary a Data Recovery Plan, would be prepared and approved by the State Historic Preservation Officer. Mitigation may include monitoring and/or excavation of sites. Thus, an intensive cultural resources survey is not deemed appropriate at this time.

Green Valley Hiking Club
Page 1 of 2



Comment No. 1

Sections 3.2 and 4.2 respectively describe the existing visual resources and potential impacts to these visual resources, including the Santa Cruz Valley, Atascosa, Tumacacori, and Pajarita Mountains, and Peck Canyon, for each alternative. Sections 3.1.2 and 4.1.2 respectively describe the existing recreational resources and potential impacts to these resources, including the relationship between visual setting and recreation.

Comment No. 2

Sections 3.2 and 4.2 of the Final EIS have been revised to indicate the proximity of the proposed project to the towns of Ruby and Arivaca, and potential impacts to these areas. Figure 3.1-1 shows both Ruby and Arivaca. Sections 3.2 and 4.2 respectively discuss the existing Scenic Integrity and changes that may result from the proposed project, including impacts to the area of the Atascosa and Tumacacori Mountains, and the Pajarita Mountains south of Ruby Road.

Green Valley Hiking Club

Page 2 of 2

2

1
CONT.

There now are only pocket areas in this part of Arizona not visually impacted by development activities. As hikers we seek out areas in which we can glimpse the true glory of the West. For example we have mapped and utilize 14 hiking trails in the Atascosa Mountains and worked with the Forest Service to preserve the Atascosa Lookout, an historic structure. We have at least 17 hikes mapped in the Tumacacori Mountains, half a dozen in the Pajaritas, and several in the Peck Canyon area. The visual integrity of all of these areas would be destroyed by the proposed extension.

2

The government impact assessments note the visual impact a possible central route for the power line would have on Amado, Tubac, and the Tumacacori Mission area, but is conspicuously quiet about the historical areas of Arivaca and Ruby, areas in which a substantial number of persons reside. One can only wonder about priorities when the visual impact of a power line in an area already corrupted by massive human encroachment is considered more significant than the impact on areas that are now relatively free from such intrusion. The same assessments do note that the impact on scenic integrity for the preferred western route would be double that for a central corridor.

1
CONT.

The Green Valley Hiking Club members believe that both the central and western routes proposed for the power line extension would negatively impact the visual integrity of the entire valley, but specifically that the western route would have a particularly egregious impact on the recreational and visual resources of this part of Arizona. For this reason we urge agencies involved in making decisions about this line extension either reject that route or to take no action on permit requests.

Thank you for your attention to our concerns.

Yours truly,



Philip A. Gray, President
Green Valley Recreation Hiking Club